

March 15, 1978

Mr. Steffen Plehn
Deputy Assistant Administrator for Solid Waste (WH-562)
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Plehn:

Thank you for the opportunity to comment on the proposed guidelines for the State Hazardous Waste Programs under Section 3006 of Subtitle C of the Solid Waste Disposal Act as amended by the Resource Conservation and Recovery Act. Seattle City Light supports EPA's efforts to address the serious problem of hazardous wastes and implement the "cradle to grave" management concept for hazardous substances. We offer the following comments.

City Light supports EPA's desire to make elements of the hazardous waste programs and permits, such as the manifest system, consistent and uniform across states, while basically allowing the states to design an adequate hazardous waste management program which is tailored to the unique requirements and concerns of each state. Because substantial transportation of wastes across state lines is often necessary, we support the requirement that uniform state manifest systems be required.

Seattle City Light is disappointed that EPA did not require State Technical Assistance programs to be included in any authorization of a state's hazardous waste management program. The state, rather than each regulated company or municipality, is most often in the best position to give advice on acceptable management options. The state has greater resources to investigate the acceptability of certain practices and will have a familiarity with most, if not all, of the hazardous waste practices in both their own state and throughout the nation. Therefore, they would be in a very favorable position to offer such technical assistance and help all affected companies benefit from innovations made elsewhere.

At a minimum, the EPA guidelines should require that any authorized state program include some provision for the state to assist the regulated community in complying with the applicable requirements and regulations. Timely implementation is the key to any successful regulations and unless you require the states to provide technical assistance, the regulated community's compliance efforts will undoubtedly be hampered.

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City Light continues to experience the problems associated with the government failing to provide such technical assistance in implementing the legislation and regulations surrounding PCBs and hopes that EPA will include provisions for requiring State Technical Assistance programs in the final guidelines for state hazardous waste management programs.

Again, thank you for the opportunity to comment.

Sincerely,

(s/s) Gordon Vickery

Gordon Vickery
Superintendent

MLO:md

cc: Mr. Donald Dubois, Region X Administrator
Environmental Protection Agency

cc: Vickery
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